

Rocky Flats Citizens Advisory Board Recommendation 99-2

to the U.S. Department of Energy

Comments on the Industrial Area Characterization and Remediation Strategy

Approved September 2, 1999

Background:

The Industrial Area Characterization and Remediation Strategy (IACRS) is a document that must be finalized to meet an end of the Fiscal Year milestone. The strategy is meant to provide a roadmap to the closure of the Industrial Area. The strategy target is closure by 2006 with an endstate that is protective of human health and the environment. The site hopes to achieve this goal by maximizing cost/schedule efficiency using project integration, optimizing characterization and remediation by consolidation of contaminated sites, and by minimizing waste generation.

Comments and Recommendations:

- The Industrial Area characterization and Remediation Strategy (IACRS) states that the Data Quality Objectives for the Integrated Monitoring Plan for Rocky Flats will be used as the basis for developing the objectives for the Industrial Area Sampling and Analysis Plan (IASAP). The strategy does not provide information as to how this task will be accomplished. RFCAB requests further information from the Department of Energy as to how this will be accomplished.
- The document does not identify the IASAP as a document for which the site will seek stakeholder input. RFCAB recommends that the IASAP be distributed to stakeholders to receive their input, in addition to decision documents, RFCA Standard Operating Protocols, proposed plans, milestones, and the CAD/ROD.
- The document does not mention methods by which worker and public health and safety will be protected. If these issues will be addressed in other documents, then there should be a statement to that effect in the IACRS.
- RFCAB recommends that the document discuss how the site will address worker safety, downwind community protection, and environmental protection when making remedial action decisions.

- Remediation technical strategies for the original process waste lines, new process waste lines, sanitary sewer systems, and storm drains are to remediate contaminated soil, process lines, and other pipelines and stabilize in place those segments with contaminant concentrations below RFCA Action Levels. RFCAB recommends that the possibility of removal of all utility and process lines from the site be evaluated, as necessary, with regulator and stakeholder participation.
- The decision framework lists the Actinide Migration Studies, the Site Water Balance Study, and the Land Configuration Design Basis as key data inputs into decisions. RFCAB recommends that the independent review of the Soil Action Levels by the Radionuclide Soil Action Level Oversight Panel be included as a data input into the decision framework.
- The strategy states that onsite treatment of waste may be considered in certain circumstances. Mixed RCRA characteristic wastes may be pretreated onsite to meet the various low-level disposal facility waste acceptance criteria. RFCAB requests that it be provided an opportunity to comment on proposed new methods for the onsite treatment of wastes.
- The document suggests that the site will use existing data to the maximum extent possible to cut down on characterization requirements for new samples. RFCAB recommends that the site not rely *solely* on historical data for the characterization of any IA group. New samples should be taken at each remediation site.
- In the introduction, the document states that the CERCLA five-year reviews for the site will be conducted "as necessary" and will be included as post-closure monitoring and operations requirements in the CAD/ROD. It is the understanding of RFCAB that CERCLA requires five-year reviews for all contaminated sites with residual contamination, and would not be performed "as necessary." RFCAB requests that the site explain the use of "as necessary" in this context.
- Monitored Natural Attenuation (MNA) is suggested as the third stage to groundwater plume remediation. The Industrial Area is known to have groundwater plumes, and it is understood by RFCAB that the site intends to install a single passive reactive barrier to treat the plumes before they become available to surface water. RFCAB also understands that the source of the contaminated plumes will be removed to reduce the continued contribution of more contaminants. And finally, what remains in the plume will be remediated using MNA. The site does not however indicate what guidelines will be used for the decision to use MNA as a remedial action. Should the site deem MNA necessary, RFCAB recommends that the site select or create guidance on the use of MNA as a remedial option, and that the selection or creation of such guidance be open to review, comment, and participation by regulators and stakeholders.
- The document also suggests that the site intends to assemble multi-organization IA Group Remediation Project Teams with representatives from a number of the site organizations (i.e. the Waste Management Program, the Analytical Services Division, Procurement, and others).

RFCAB recommends that the site include in those groups individuals responsible for post-closure maintenance and monitoring planning. It is important that each of the remediation plans that are developed consider the post-closure implications of the actions. An individual from the Site Technology Coordination Group should also be included to identify relevant new technologies. The use of new technologies, as they are appropriate, could help to reduce expenditures on cleanup, minimize waste generation, and accelerate schedules while also allowing greater cleanup.

- RFCAB also recommends that the site involve stakeholders in the meetings of the IA Group Remediation Project Teams. Just as the participation of regulators in the planning of activities will assist in the streamlining of the regulator approval process, so too will the involvement of stakeholders throughout the planning processes assist in the streamlining of the public comment process. This attendance will allow stakeholders to view the same information as those that propose remedial actions in decision documents.

The Rocky Flats Citizens Advisory Board is a community advisory group that reviews and provides recommendations on cleanup plans for Rocky Flats, a former nuclear weapons plant outside of Denver, Colorado.

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